

<p style="text-align: right;">Page 90</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian Liberation Authority; is that correct?</p> <p>3 A. I don't know. I don't know.</p> <p>4 Q. Okay. Okay. Let's move down to the next</p> <p>5 item on this page. It says, "Trade Certification."</p> <p>6 can you tell us -- can you tell us what service that</p> <p>7 involves?</p> <p>8 A. I haven't done any of this; none.</p> <p>9 Q. Okay. Can you describe the nature of this</p> <p>10 service, whether or not you've actually performed</p> <p>11 it?</p> <p>12 A. Maybe it involves registering a company in</p> <p>13 New Jersey.</p> <p>14 Q. Okay. Does it involve registering any</p> <p>15 companies or businesses outside of the United</p> <p>16 States?</p> <p>17 A. No, I haven't done none -- neither inside,</p> <p>18 nor outside the States. I didn't do any of them.</p> <p>19 Q. Okay. Let's go down to the next one,</p> <p>20 "Academic Record Certification"; can you describe</p> <p>21 that service for me, please?</p> <p>22 A. This is a service where if a doctor</p> <p>23 graduates from a university, or a hospital, or a</p> <p>24 program, we certify this degree for this person to</p> <p>25 be able to work in other countries back in Jordan,</p>	<p style="text-align: right;">Page 92</p> <p>1 A. ABU HBDA</p> <p>2 maybe. In Canada.</p> <p>3 Q. Is Canada the same office that we were</p> <p>4 talking about before, correct, sir?</p> <p>5 MR. SINAIKO: Let the record reflect that</p> <p>6 Mr. Abu Hbda answered the question in English,</p> <p>7 before the translation came.</p> <p>8 Q. Sir, have you ever had personal authority</p> <p>9 to provide certification of a document on behalf of</p> <p>10 the Palestinian Authority?</p> <p>11 A. No.</p> <p>12 Q. Have you ever personally had the authority</p> <p>13 to certify any document on behalf of the Palestine</p> <p>14 Liberation Organization?</p> <p>15 A. No.</p> <p>16 Q. Okay. In connection with the documents</p> <p>17 that you submit to an office in Canada that we've</p> <p>18 been talking about, I believe you mentioned that the</p> <p>19 office in Canada charges some sort of a fee; is</p> <p>20 that -- do you recall that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you, you know --</p> <p>23 Again, do you remember that you told us</p> <p>24 before that you also -- you also collect a fee from</p> <p>25 the customer yourself?</p>
<p style="text-align: right;">Page 91</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian, Lebanon. So, he brings this documents,</p> <p>3 and we certify this document, so that he can work in</p> <p>4 these other countries.</p> <p>5 Q. And when you say you certify the document,</p> <p>6 what do you mean by that?</p> <p>7 A. We send it to the embassy of the country</p> <p>8 that he's entering into.</p> <p>9 Q. Okay. So, this would be -- and just to,</p> <p>10 you know, go back to the document, if we need to,</p> <p>11 and let me know if you'd like to go back to the</p> <p>12 document, but I'm thinking, is this a service</p> <p>13 similar to the service that you performed with</p> <p>14 respect to, you know, the document that had the red</p> <p>15 and blue stamps that we were looking at before?</p> <p>16 A. Approximately, yes. It's similar. It's</p> <p>17 the same thing.</p> <p>18 Q. Okay. And that's the service that you</p> <p>19 could perform just to get records certified by the</p> <p>20 Palestinian Authority or the Palestinian Liberation</p> <p>21 Authority, correct; Palestinian Liberation</p> <p>22 Organization?</p> <p>23 A. No, it's not -- neither from the</p> <p>24 Palestinian government, no. The Liberation, the</p> <p>25 Liberation, it's from the office in Washington,</p>	<p style="text-align: right;">Page 93</p> <p>1 A. ABU HBDA</p> <p>2 A. Correct.</p> <p>3 Q. Has there ever been a circumstance in</p> <p>4 which the office in Canada, to which you sent</p> <p>5 documents, has shared a portion of its fee with you?</p> <p>6 A. No.</p> <p>7 Q. Have you ever asked -- let me withdraw</p> <p>8 that question. It's an inartful question.</p> <p>9 Have you ever asked that the office in</p> <p>10 Canada, to which you've been submitting documents,</p> <p>11 as we've been discussing, to share its fee with you?</p> <p>12 A. No.</p> <p>13 Q. Is the office in Canada to which you</p> <p>14 submit documents aware that you charge a fee to your</p> <p>15 customers for making these submissions on their</p> <p>16 behalf?</p> <p>17 MR. BERGER: Objection, calls for</p> <p>18 speculation.</p> <p>19 Q. To your knowledge?</p> <p>20 A. I'm sorry, could you repeat the question.</p> <p>21 Q. Let me rephrase the question. To your</p> <p>22 knowledge, is the -- are the -- is the office in</p> <p>23 Canada that we've been talking about aware that when</p> <p>24 you submit documents to them for certification, you</p> <p>25 are collecting a fee for your customers?</p>

<p style="text-align: right;">Page 94</p> <p>1 A. ABU HBDA</p> <p>2 A. For my fee -- for my fees. Why are they</p> <p>3 concerned with my fees?</p> <p>4 Q. Okay. Let's get the question read back.</p> <p>5 MR. SINAIKO: I would like to just have</p> <p>6 the question read back because I think the</p> <p>7 question was pretty clear, and we should just get</p> <p>8 an answer to it. I think -- could we just ask the</p> <p>9 question of Mr. Abu Hbda again.</p> <p>10 THE INTERPRETER: Sure.</p> <p>11 (Whereupon, the requested portion was read</p> <p>12 back by the reporter.)</p> <p>13 A. They are not concerned because why are</p> <p>14 they concerned with my fees? They -- the customers</p> <p>15 bring a money order for the fees that the office</p> <p>16 charges from, and then I will speak with the</p> <p>17 customer, and they pay me my fees. So, this --</p> <p>18 these are two separate things. Why are they</p> <p>19 involved with my fees? These fees go to a money</p> <p>20 order.</p> <p>21 Q. I'm going to try the question again.</p> <p>22 To your knowledge, is the office in Canada</p> <p>23 to which you submit documents --</p> <p>24 This office in Canada we've been</p> <p>25 discussing; is the office in Canada aware that you</p>	<p style="text-align: right;">Page 96</p> <p>1 A. ABU HBDA</p> <p>2 which you send documents to be certified or</p> <p>3 legalized?</p> <p>4 A. No, like in situations where the papers</p> <p>5 takes a long time, you call and leave a message.</p> <p>6 You don't speak with anybody personally and they</p> <p>7 don't pick up the phone.</p> <p>8 Q. Okay. Putting aside oral communications,</p> <p>9 have you ever communicated in writing with anybody</p> <p>10 in this office in Canada that we've been discussing?</p> <p>11 A. No.</p> <p>12 Q. Okay. Let's go down two stops -- we're</p> <p>13 still on Page 2 of Exhibit 4. Let's go down two</p> <p>14 stops to, "Power of Attorney"; do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Can you describe that service for us?</p> <p>17 A. So, this document special for Palestinians</p> <p>18 who want to give Powers of Attorney, or authorize</p> <p>19 people; example either registering a land, either</p> <p>20 divorce in the court of the legal court, or doing</p> <p>21 something where they cannot go to the home country,</p> <p>22 they authorize or give the Powers of Attorney to</p> <p>23 another person over there to do that.</p> <p>24 Q. And these are Powers of Attorney that are</p> <p>25 used in areas under control of the Palestinian</p>
<p style="text-align: right;">Page 95</p> <p>1 A. ABU HBDA</p> <p>2 charge a fee to your clients in connection with the</p> <p>3 performance of that service; are you aware?</p> <p>4 A. They never asked me. I never asked them.</p> <p>5 Q. So, the answer is, you don't know whether</p> <p>6 they're aware or not; is that correct, sir?</p> <p>7 A. I don't know. I don't interfere with</p> <p>8 those things. I don't even speak with them. I</p> <p>9 don't know.</p> <p>10 Q. Actually, that's -- that raises one</p> <p>11 question I had, and we could just address it now.</p> <p>12 Have you ever communicated orally with any</p> <p>13 representative of this office in Canada that we are</p> <p>14 discussing there?</p> <p>15 A. Is -- there is certain situation where you</p> <p>16 call, basically to just inquire whether your</p> <p>17 documents have been finished or not.</p> <p>18 Q. Okay. Apart from communications of that</p> <p>19 nature, have you ever communicated orally with</p> <p>20 anybody at the office in Canada that we've been</p> <p>21 talking about? That's the question. Let me</p> <p>22 rephrase the question.</p> <p>23 Apart from communications of that nature,</p> <p>24 have you ever communicated orally with anybody in</p> <p>25 this office in Canada that we've been discussing to</p>	<p style="text-align: right;">Page 97</p> <p>1 A. ABU HBDA</p> <p>2 Authority, to your understanding; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And do you prepare these documents, or are</p> <p>5 they prepared by somebody else, and you just</p> <p>6 notarize the signatures?</p> <p>7 A. Most of the people bring this completed</p> <p>8 document for attorneys in my home country, and we</p> <p>9 just notarize them. They sign these papers in front</p> <p>10 of us. We sign and notarize it.</p> <p>11 Q. And do you ever submit these Powers of</p> <p>12 Attorney to, you know, to the office in Canada, or</p> <p>13 to any other office that you might understand to be</p> <p>14 affiliated with the Palestinian Authority, or the</p> <p>15 Palestinian Liberation Organization?</p> <p>16 A. Sure. So, after this person signs it, I</p> <p>17 sign it and notarize it. We give it to that person,</p> <p>18 and give them the address and contact information</p> <p>19 for the counsel, or the litigant in Canada, and tell</p> <p>20 him that you have to have a money order, and you</p> <p>21 have to send it there, and most people do it.</p> <p>22 Some people tell us that they don't know</p> <p>23 how to do it, and they need us to do it for them.</p> <p>24 So, again, we do this by having the money order, and</p> <p>25 sending it by FedEx to the office in Canada. So,</p>

<p style="text-align: right;">Page 98</p> <p>1 A. ABU HBDA</p> <p>2 it's either or.</p> <p>3 Q. Okay. Let's jump down one more stop here,</p> <p>4 and do you see Mr. Abu Hbda that it says, "Land and</p> <p>5 Property Transaction"?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Can you describe this service that's</p> <p>8 reflected there?</p> <p>9 A. So, this is similar to the authorization I</p> <p>10 spoke about, like if someone wants to sell a land,</p> <p>11 or construe the land in my home country, they bring</p> <p>12 the papers and they sign it in front of us, and we</p> <p>13 notarize it, and we send it to Canada, but before</p> <p>14 that, we have to send them email to the office of</p> <p>15 Land and Corporate in Ramallah, and we get a</p> <p>16 response, and then the communication will directly</p> <p>17 between Canada, the office in Canada and this office</p> <p>18 in Ramallah.</p> <p>19 Q. Okay. Terrific.</p> <p>20 MR. SINAICO: We've been going for an hour</p> <p>21 and ten minutes. Would it be all right if we took</p> <p>22 a short break?</p> <p>23 THE INTERPRETER: I want to continue</p> <p>24 because I don't have time.</p> <p>25 MR. SINAICO: Well, with apologies, I</p>	<p style="text-align: right;">Page 100</p> <p>1 A. ABU HBDA</p> <p>2 registered in that person's name who wants to sell</p> <p>3 it to make sure that he owns it.</p> <p>4 Q. Okay. And is that a procedure that's</p> <p>5 required by the -- by laws or regulations of the</p> <p>6 Palestinian Authority?</p> <p>7 A. No, it's something that to make sure that</p> <p>8 the person who's buying the land is protected, and</p> <p>9 really the land is in the name of the seller. It's</p> <p>10 not required by the government.</p> <p>11 Q. Ah, and how did you learn of the existence</p> <p>12 of this office where you send the emails?</p> <p>13 A. I think the office in Canada sent us an</p> <p>14 email saying you have to email the office in</p> <p>15 Ramallah, and the office in Ramallah will get in</p> <p>16 contact with them.</p> <p>17 Q. And how did you come to receive that email</p> <p>18 from the office in Canada?</p> <p>19 A. Honestly, I don't remember if it came as</p> <p>20 an email or a message. I don't remember.</p> <p>21 Q. Whether it was an email, or a message, my</p> <p>22 question is, do you recall how you came to receive</p> <p>23 that communication from the office in Canada,</p> <p>24 whether it was either in written or oral form?</p> <p>25 A. I don't remember exactly the incident. I</p>
<p style="text-align: right;">Page 99</p> <p>1 A. ABU HBDA</p> <p>2 actually need to take a break for three minutes.</p> <p>3 We could stay on the record, if you want. I just</p> <p>4 need to get up for three minutes and I'll be right</p> <p>5 back.</p> <p>6 THE INTERPRETER: Let's make it five</p> <p>7 minutes.</p> <p>8 MR. SINAICO: Take five. Let's go off the</p> <p>9 record for five minutes. We'll come back at 2:52.</p> <p>10 THE INTERPRETER: Thank you, sir.</p> <p>11 THE VIDEOGRAPHER: Okay. We are now off</p> <p>12 the record at 18:47 UTC Time.</p> <p>13 (Whereupon, a short recess was taken.)</p> <p>14 THE VIDEOGRAPHER: We are now back on the</p> <p>15 record. The time is 18:53 UTC time.</p> <p>16 Q. Mr. Abu Hbda, you mentioned a moment ago,</p> <p>17 in connection with land and property transactions on</p> <p>18 this page, Page 2 of Exhibit 4, that there are times</p> <p>19 where you need to communicate by email with an</p> <p>20 office in Ramallah; do you recall mentioning that?</p> <p>21 A. I just send the email. I don't speak with</p> <p>22 anyone.</p> <p>23 Q. Understood, but what is the purpose of</p> <p>24 these emails?</p> <p>25 A. Just to inspect that the land is really</p>	<p style="text-align: right;">Page 101</p> <p>1 A. ABU HBDA</p> <p>2 don't remember.</p> <p>3 Q. Let's look at one more thing on Page 2</p> <p>4 here. It says -- you see it says, "All Arab Nations</p> <p>5 Documents Certification"?</p> <p>6 A. It's the same, doing certifications,</p> <p>7 certificate, or -- sorry, authorization --</p> <p>8 THE INTERPRETER: Delete that --</p> <p>9 A. -- doing authorization. Doing same thing</p> <p>10 we were doing, like if someone comes from Jordan, we</p> <p>11 do notarization from Jordan. If someone comes to do</p> <p>12 notarization from the Gulf countries, or Egypt, or</p> <p>13 Yemen, or Israel. So, it's the same. It's just</p> <p>14 doing notarizations for other countries.</p> <p>15 Q. Authorizations of what sort?</p> <p>16 A. Notarization.</p> <p>17 Q. Notarization. Got it. I'm so sorry.</p> <p>18 Maybe I misheard. Okay.</p> <p>19 So, just to be clear, I want to make sure</p> <p>20 it's notarization, by you as a Notary Public of the</p> <p>21 State of New Jersey, of a documentation to a foreign</p> <p>22 government?</p> <p>23 A. Correct.</p> <p>24 Q. A foreign government, or the Palestinian</p> <p>25 Authority, or the Palestinian Liberation</p>

<p style="text-align: right;">Page 102</p> <p>1 A. ABU HBDA</p> <p>2 Organization, right?</p> <p>3 A. No, I didn't say that. I said other</p> <p>4 foreign governments. I didn't say Palestinian</p> <p>5 government. I didn't say the Palestinian Liberation</p> <p>6 Organization. Yes, other government; this is what I</p> <p>7 said.</p> <p>8 Q. Okay. So, all Arab nations document</p> <p>9 certification does not -- that service that your</p> <p>10 company performs does not in any way involve the</p> <p>11 Palestinian Authority, or the Palestinian Liberation</p> <p>12 Organization, correct?</p> <p>13 A. I'm a New Jersey Notary. I notarize</p> <p>14 papers to people, and they send it wherever they</p> <p>15 want to. This doesn't change anything for me.</p> <p>16 Q. Understood. So, they -- I mean, they</p> <p>17 could be documents used for any purpose? It's a</p> <p>18 documentation for notarization purposes; is that</p> <p>19 right?</p> <p>20 A. Yes, I -- I'm just a New Jersey Notary,</p> <p>21 and that's all. I just notarize the documents in</p> <p>22 New Jersey; that's all.</p> <p>23 Q. Very good. Okay. I want to go back to a</p> <p>24 topic that we discussed briefly earlier. I'm going</p> <p>25 to try to come back to it. Subsequent to</p>	<p style="text-align: right;">Page 104</p> <p>1 A. ABU HBDA</p> <p>2 you communicated orally with any person you</p> <p>3 understood to be an officer, or an agent, or</p> <p>4 employee, or in any way affiliated with this office</p> <p>5 in Canada that -- that we've been discussing, the</p> <p>6 office to which you submit documents when you would</p> <p>7 like them to be legalized by the Palestinian</p> <p>8 Authority?</p> <p>9 A. No.</p> <p>10 Q. And since you received the Subpoena, have</p> <p>11 you communicated in writing, including by email,</p> <p>12 with any person you understand to be an officer, or</p> <p>13 an agent, or an employee, or in any way affiliate</p> <p>14 with the Palestinian Authority?</p> <p>15 A. No.</p> <p>16 Q. And since you received the Subpoena, have</p> <p>17 you communicated in writing, including via email,</p> <p>18 with any person you understood to be about officer,</p> <p>19 or an agent, or an employee or in any way affiliated</p> <p>20 with the Palestinian Liberation Organization?</p> <p>21 A. No.</p> <p>22 Q. Okay. And since you received the</p> <p>23 Subpoena, have you communicated in writing with any</p> <p>24 person of your understanding to be an officer, or an</p> <p>25 agent, or an employee, or any way affiliated with</p>
<p style="text-align: right;">Page 103</p> <p>1 A. ABU HBDA</p> <p>2 receiving -- well, let me withdraw that.</p> <p>3 Do you remember, Mr. Abu Hbda, that</p> <p>4 earlier today, we looked at one of the Subpoenas</p> <p>5 that you were served with; do you recall that?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. To your recollection -- and by the</p> <p>8 way, let's just --</p> <p>9 I mean, we could confirm it, but the</p> <p>10 Subpoena was served on you. Hang on one second --</p> <p>11 the Subpoena was served on you around March 11th;</p> <p>12 does that sound right, sir?</p> <p>13 A. Correct.</p> <p>14 Q. Since you received the Subpoena, have you</p> <p>15 communicated orally with any person you understood</p> <p>16 to be an officer, agent, or employee, or in any way</p> <p>17 related to the Palestinian Authority?</p> <p>18 A. No.</p> <p>19 Q. And since you received the Subpoena, have</p> <p>20 you communicated orally with any person you</p> <p>21 understood to be an officer, or agent, or employee,</p> <p>22 or in any way related to the Palestinian Liberation</p> <p>23 Organization?</p> <p>24 A. No.</p> <p>25 Q. And since you received the Subpoena, have</p>	<p style="text-align: right;">Page 105</p> <p>1 A. ABU HBDA</p> <p>2 this office in Canada, which we've been discussing,</p> <p>3 to which you authorized notarization of</p> <p>4 documentation you submit to the Palestinian</p> <p>5 Authority?</p> <p>6 A. No.</p> <p>7 Q. Okay. To your knowledge -- well, let me</p> <p>8 withdraw that. Start again.</p> <p>9 The question I'm about to ask you is based</p> <p>10 on your personal knowledge. To your personal</p> <p>11 knowledge and, you know, in advance of today, was</p> <p>12 any person who you understand to be an agent, or an</p> <p>13 employee, or an officer, or somehow affiliated with</p> <p>14 the Palestinian Liberation Organization, aware of</p> <p>15 you were being served with a subpoena?</p> <p>16 A. I haven't told anybody about that, no.</p> <p>17 Q. Okay. But to your --</p> <p>18 Putting aside whether you told anybody or</p> <p>19 not, to your knowledge, are any such people aware</p> <p>20 of?</p> <p>21 A. How would I know? I haven't spoken with</p> <p>22 anybody.</p> <p>23 Q. So --</p> <p>24 A. But I don't know. How would I know if</p> <p>25 anybody knows?</p>



<p style="text-align: right;">Page 106</p> <p>1 A. ABU HBDA</p> <p>2 Q. To your knowledge, you're not aware of</p> <p>3 that? That's all I'm asking.</p> <p>4 A. I don't know. I don't know anything.</p> <p>5 Q. Okay. And to your knowledge, again, just</p> <p>6 your personal knowledge, and in advance of today,</p> <p>7 was any person who you understand to be an agent, or</p> <p>8 an employee, or an officer, or otherwise affiliated</p> <p>9 with the Palestinian Authority aware of the Subpoena</p> <p>10 that was served on you in connection with today's</p> <p>11 deposition?</p> <p>12 A. No, I don't know. I don't know.</p> <p>13 Q. So, the answer is -- I mean, I just want</p> <p>14 to confirm that I understood correctly.</p> <p>15 To your knowledge, you are not aware of</p> <p>16 any such person being knowledgeable about the fact</p> <p>17 that you were served with the Subpoena?</p> <p>18 A. For me, I didn't tell anybody.</p> <p>19 Q. Right. But that, again, I just want to be</p> <p>20 clear; you're not aware of any such person knowing</p> <p>21 whether you told them or not?</p> <p>22 A. God only knows. Am I God? I don't know.</p> <p>23 How would I know.</p> <p>24 Q. Okay. And one last question in this line.</p> <p>25 To your knowledge, in advance of today, was any</p>	<p style="text-align: right;">Page 108</p> <p>1 A. ABU HBDA</p> <p>2 Q. And what is that address?</p> <p>3 A. This is my address.</p> <p>4 Q. Your address. Is that a home address?</p> <p>5 A. No.</p> <p>6 Q. Okay. What kind of an address is that?</p> <p>7 Is that the address where your business is located?</p> <p>8 A. Yes, this is the office; yes.</p> <p>9 Q. Okay. How long has the office of your</p> <p>10 business been at that location?</p> <p>11 A. I don't remember exactly, maybe two years.</p> <p>12 I don't remember exactly.</p> <p>13 Q. All right.</p> <p>14 MR. SINAIKO: Cosette, can we get Exhibit</p> <p>15 5 again, please? I think that was Tab 10.</p> <p>16 MS. VINCENT: Tab 10.</p> <p>17 MR. SINAIKO: But, I think we marked it as</p> <p>18 Exhibit 5.</p> <p>19 MS. VINCENT: So, which page?</p> <p>20 MR. SINAIKO: So, we're going to go to</p> <p>21 Page 36 of the PDF. Actually, it has a number in</p> <p>22 the lower right-hand; 296.</p> <p>23 MS. VINCENT: Maybe it should be up.</p> <p>24 MR. SINAIKO: Yeah, that looks right. Can</p> <p>25 we zoom?</p>
<p style="text-align: right;">Page 107</p> <p>1 A. ABU HBDA</p> <p>2 person who is an employee, or agent, or officer, or</p> <p>3 otherwise affiliated with this office in Canada that</p> <p>4 we've been talking about, where you submit documents</p> <p>5 for, you know, certification or authentication of</p> <p>6 documents by the Palestinian Liberation Authority,</p> <p>7 were any of those people, to your knowledge, aware</p> <p>8 that you were served with the Subpoena?</p> <p>9 A. I don't know.</p> <p>10 Q. Okay. Not -- so, to your knowledge, the</p> <p>11 answer is no; is that correct?</p> <p>12 A. I don't know. I don't know anything. I</p> <p>13 don't know.</p> <p>14 Q. Okay. By the way, your business -- let's</p> <p>15 go to the last page of Exhibit -- I guess this is</p> <p>16 Exhibit 4.</p> <p>17 MR. SINAIKO: Cosette, can we zoom in on</p> <p>18 the thumbtack, please? There we go. Let's zoom</p> <p>19 in on that.</p> <p>20 Q. Mr. Abu Hbda, do you see the thumbtack</p> <p>21 that we zoomed in on here on Exhibit 4?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. And you see there's an address</p> <p>24 there, 964 Main Street, in Paterson, New Jersey?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 109</p> <p>1 A. ABU HBDA</p> <p>2 Actually, let me ask Mr. Abu Hbda.</p> <p>3 Q. Have you seen this page before? Do you</p> <p>4 recognize it? Anything you want to see, let us</p> <p>5 know, and we could move the pages around for you.</p> <p>6 Whatever you'd like us to do, we'll do.</p> <p>7 A. No, I haven't seen it.</p> <p>8 Q. Okay.</p> <p>9 MR. SINAIKO: Cosette, can you zoom in the</p> <p>10 upper left-hand logo in the corner.</p> <p>11 Q. Do you see the logo, Mr. Abu Hbda?</p> <p>12 A. Yeah.</p> <p>13 Q. Okay. Do you see it says, "PLO General</p> <p>14 Delegations to the United States"?</p> <p>15 MR. SINAIKO: Can we make it any larger?</p> <p>16 I know it's -- I'm having a hard time seeing it</p> <p>17 to. There we go. Might be better.</p> <p>18 Q. Does that make it easier? Can you see the</p> <p>19 logo, Mr. Abu Hbda?</p> <p>20 A. Why.</p> <p>21 Q. Do you see that it says, "General</p> <p>22 Delegation to the United States"?</p> <p>23 A. Yes.</p> <p>24 Q. Do you have an understanding of what the</p> <p>25 PLO General Delegation to the United States is or</p>

<p style="text-align: right;">Page 110</p> <p>1 A. ABU HBDA</p> <p>2 was?</p> <p>3 A. Yes.</p> <p>4 Q. And what do you understand that the PLO</p> <p>5 General Delegations of the United States is or was?</p> <p>6 A. It is a representative of Palestinian</p> <p>7 Authority.</p> <p>8 Q. Okay. And is that an analogue, or a</p> <p>9 former analogue in the United States to the office</p> <p>10 in Canada that we've been talking about?</p> <p>11 A. I don't know because I've never seen this</p> <p>12 page. This is the first time I've seen it.</p> <p>13 Q. Okay. But putting aside the web page, and</p> <p>14 whether you've seen it or not, do you have -- were</p> <p>15 you aware of what the general PLO delegation to the</p> <p>16 United States was?</p> <p>17 A. It used to have the Palestinian Authority</p> <p>18 for the documents and papers.</p> <p>19 Q. Right.</p> <p>20 A. Something --</p> <p>21 Q. And in that respect, did this office</p> <p>22 perform a bunch in -- similar to the one that is</p> <p>23 performed by this office in Canada that you deal</p> <p>24 with on behalf of your clients, who are looking to</p> <p>25 have documents legalized or certified by the</p>	<p style="text-align: right;">Page 112</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And you see that the box in the</p> <p>4 upper left-hand corner says, "General Powers of</p> <p>5 Attorneys"; do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. That's a service that is also provided by</p> <p>8 Awni Abu Hbda Documentation Services, correct?</p> <p>9 A. I notarize it as a -- as a notary; yes.</p> <p>10 Q. Okay. And you see in the -- in the center</p> <p>11 on the top there, it says, "Durable Land Power of</p> <p>12 Attorney"; do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And that's also a service that Awni Abu</p> <p>15 Hbda Documentation Services provides in connection</p> <p>16 with the Palestinian Authority, correct?</p> <p>17 A. I do it -- I notarize it as a notary</p> <p>18 public; yes.</p> <p>19 Q. Okay.</p> <p>20 MR. SINAICO: Cosette, let's go to Page --</p> <p>21 I guess it's Page 42 of the PDF.</p> <p>22 MS. VINCENT: Sure; sure thing.</p> <p>23 Q. Mr. Abu Hbda, this -- just to be clear,</p> <p>24 this is another page of the Exhibit that we have</p> <p>25 been looking at.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. ABU HBDA</p> <p>2 Palestinian Authority?</p> <p>3 A. Yes, they were authenticating the papers,</p> <p>4 notarizing the paper; yes.</p> <p>5 Q. And while that office was in existence,</p> <p>6 was it part of your business at Awni Abu Hbda</p> <p>7 Documentation Services for certifications or</p> <p>8 legalization of this office PLO General Delegation</p> <p>9 to the United States?</p> <p>10 A. Most of the people from New Jersey, and</p> <p>11 New Jersey when we used to notarize the papers, they</p> <p>12 go by themselves; they go in person to that office.</p> <p>13 Q. I'm not sure I understand that exactly.</p> <p>14 Do you mean they would go to the office, PLO General</p> <p>15 Delegation to the United States?</p> <p>16 A. Yes, sir; yes.</p> <p>17 Q. Okay.</p> <p>18 MR. SINAICO: Cosette, let's zoom out.</p> <p>19 Okay.</p> <p>20 Q. Do you see this page is titled, "Conular</p> <p>21 Affairs"?</p> <p>22 A. Yes.</p> <p>23 Q. When you see underneath that on the</p> <p>24 upper -- there are one, two, three and four, five,</p> <p>25 six boxes there; do you see that?</p>	<p style="text-align: right;">Page 113</p> <p>1 A. ABU HBDA</p> <p>2 A. I see that was Page 42, correct?</p> <p>3 MR. SINAICO: It's Page 42 of the PDF; 42</p> <p>4 out of 55; correct, Cosette?</p> <p>5 MS. VINCENT: It should be shared.</p> <p>6 MR. SINAICO: That's it.</p> <p>7 Q. Okay. Mr. Abu Hbda, do you see that page</p> <p>8 that's got, "A302," in the lower right-hand corner?</p> <p>9 A. Yes.</p> <p>10 Q. And you see it says, "Notary Publics"?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And do you see that -- I guess it</p> <p>13 says, "Notary Publics," in the upper left-hand logo?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then it says, "Notary Publics,"</p> <p>16 again in the middle of the page. I guess -- there's</p> <p>17 a paragraph, and then to the right, it says, "Notary</p> <p>18 Publics," again; can you see that?</p> <p>19 MR. SINAICO: Sorry. Can we enlarge that</p> <p>20 for Mr. Abu Hbda?</p> <p>21 Q. Does that help? Okay. And do you see</p> <p>22 that there are a number of cities listed there?</p> <p>23 Okay. And do you see that one of them is</p> <p>24 Paterson?</p> <p>25 A. Yes, I see it.</p>

<p style="text-align: right;">Page 114</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay.</p> <p>3 MR. SINAIKO: Let's move to Page 8038.</p> <p>4 It's a few more pages in. And let's zoom in</p> <p>5 again, so that Mr. Abu Hbda can see better, so</p> <p>6 that I can see better; my eyes are terrible, also.</p> <p>7 Q. Do you see that that's your name there,</p> <p>8 sir?</p> <p>9 A. Yes.</p> <p>10 MR. SINAIKO: He understands the</p> <p>11 questions, which is terrific.</p> <p>12 Q. And do you see there's some letters there</p> <p>13 in a foreign letter, which I unfortunately don't</p> <p>14 understand, but do you see next to your name,</p> <p>15 there's some foreign letters there?</p> <p>16 A. Yes.</p> <p>17 Q. And can you tell us what that is?</p> <p>18 A. It's my name, "Abu Hbda."</p> <p>19 Q. That's your name in Arabic?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And underneath that, it says "388."</p> <p>22 By the way, do you understand that that's a</p> <p>23 reference to you?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And do you see underneath it, it</p>	<p style="text-align: right;">Page 116</p> <p>1 A. ABU HBDA</p> <p>2 the embassy, and they know, they saw my name coming</p> <p>3 on these papers, and they called me, and they asked</p> <p>4 me, and I said I agree.</p> <p>5 Q. And who was it that called you, if you</p> <p>6 remember?</p> <p>7 A. I don't remember exactly, but I think</p> <p>8 someone was working there. His name is Hakim.</p> <p>9 Q. Okay. Do you know what Hakim's role was</p> <p>10 in that office?</p> <p>11 THE INTERPRETER: I'm sorry, can you</p> <p>12 repeat the question, sir?</p> <p>13 MR. SINAIKO: Sure.</p> <p>14 Q. Do you know what Hakim's role was in the</p> <p>15 office? And by that I mean, the General Delegation</p> <p>16 of the United States?</p> <p>17 A. No, I know that he was working there;</p> <p>18 that's it.</p> <p>19 Q. Okay. Apart from --</p> <p>20 Do you remember what Hakim told you in</p> <p>21 this conversation that you had with him and what you</p> <p>22 said to him?</p> <p>23 A. He asked me if they could put my name on</p> <p>24 the Website to notarize the papers that they</p> <p>25 authenticated.</p>
<p style="text-align: right;">Page 115</p> <p>1 A. ABU HBDA</p> <p>2 says, "388 Lake View Avenue, Clifton, New Jersey?"</p> <p>3 A. Yes.</p> <p>4 Q. And what is that address?</p> <p>5 A. This is my office address. I had an</p> <p>6 office at that place in the past.</p> <p>7 Q. Understood. And do you still have an</p> <p>8 office there?</p> <p>9 A. No.</p> <p>10 Q. Okay. Underneath that, there's a</p> <p>11 telephone number. Do you see the telephone number?</p> <p>12 I think it's a telephone number.</p> <p>13 A. Yes.</p> <p>14 Q. And is that a telephone number that you</p> <p>15 used for your business?</p> <p>16 A. This is my personal cell phone.</p> <p>17 Q. Personal cell phone. Got it. So, let me</p> <p>18 ask a question; do you have an understanding as to</p> <p>19 how your name came to be placed on a Website of the</p> <p>20 PLO Delegation to the United States, General</p> <p>21 Delegation to the United States?</p> <p>22 A. Yes, I know.</p> <p>23 Q. And can you explain for the Court how that</p> <p>24 happened?</p> <p>25 A. So, I used to notarize papers that goes to</p>	<p style="text-align: right;">Page 117</p> <p>1 A. ABU HBDA</p> <p>2 Q. And do you remember anything that you said</p> <p>3 to Hakim during the call?</p> <p>4 A. Yes, I told him, "yes, I agree."</p> <p>5 Q. And do you remember anything else about</p> <p>6 this telephone call that you had with Hakim?</p> <p>7 A. No.</p> <p>8 Q. And do you remember any other</p> <p>9 communications that you had with Hakim, apart from</p> <p>10 this telephone call that you described?</p> <p>11 A. So, if papers are delayed, or if we have a</p> <p>12 question, we used to call him to inquire about</p> <p>13 the -- just the question.</p> <p>14 Q. So, he was a contact of yours at the PLO</p> <p>15 General Delegations of the United States when that</p> <p>16 office was open, correct?</p> <p>17 A. This is the person that I knew -- all -- I</p> <p>18 knew his name there.</p> <p>19 Q. Did you ever meet him in person?</p> <p>20 MR. SINAIKO: Just let the record reflect</p> <p>21 that Mr. --</p> <p>22 A. I've never met Hakim in my life. I only</p> <p>23 saw Hakim on TV.</p> <p>24 MR. SINAIKO: Let the record reflect that</p> <p>25 before Mr. -- you know, before the translator</p>

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<p style="text-align: right;">Page 118</p> <p>1 A. ABU HBDA</p> <p>2 translated that answer, Mr. Abu Hbda had provided</p> <p>3 the answer to the question.</p> <p>4 Q. Okay. Apart from Hakim, did you ever</p> <p>5 communicate with any other person who worked at the</p> <p>6 office of the PLO General Delegations of the United</p> <p>7 States?</p> <p>8 A. There was another person, his name was</p> <p>9 Dr. Omar. He was the, you know, legal</p> <p>10 representative there, and we used to ask him</p> <p>11 questions; the same thing we were doing with Hakim.</p> <p>12 Q. Okay. Apart from Hakim and Dr. Omar, did</p> <p>13 you ever communicate with anybody else who worked at</p> <p>14 the PLO General Delegation to the United States?</p> <p>15 A. I don't remember speaking with anyone</p> <p>16 else; no.</p> <p>17 Q. How many times would you say you've</p> <p>18 communicated with Dr. Omar?</p> <p>19 A. I don't remember; maybe once, twice. I</p> <p>20 don't know. I don't remember.</p> <p>21 Q. When was the last time you spoke with</p> <p>22 Hakim, the individual we mentioned a few minutes</p> <p>23 ago?</p> <p>24 A. After they closed the -- cancel it. I</p> <p>25 don't know anything about what happened after.</p>	<p style="text-align: right;">Page 120</p> <p>1 A. ABU HBDA</p> <p>2 of Paterson, and I know we looked, that that's a</p> <p>3 large honorary role, and I want to know if you had</p> <p>4 any honorary delegations that might have been given</p> <p>5 to you at the PLO General Delegation of the United</p> <p>6 States?</p> <p>7 A. No, there isn't.</p> <p>8 MR. SINAIKO: Cosette, can we bring up</p> <p>9 Exhibit 12, please, and we're going to mark this</p> <p>10 as Exhibit 6.</p> <p>11 (Whereupon, Subpoena to Produce was marked as</p> <p>12 Exhibit 6 for identification, as of April 7th,</p> <p>13 2021.)</p> <p>14 MR. SINAIKO: I'll ask the court reporter</p> <p>15 to mark it, Subpoena to Produce Documents,</p> <p>16 Information, or Objects, or to Permit Inspections</p> <p>17 of Premises in Civil Action.</p> <p>18 Q. My question to you, Mr. Abu Hbda, feel</p> <p>19 free to take a look at the document, if you want to</p> <p>20 page through it. Cosette can help you with that.</p> <p>21 Just tell her what you'd like her to do.</p> <p>22 My question to you is, after you looked at</p> <p>23 the document, is whether you recognize it?</p> <p>24 A. Yes, I've seen it.</p> <p>25 Q. And what do you recognize this document to</p>
<p style="text-align: right;">Page 119</p> <p>1 A. ABU HBDA</p> <p>2 Q. And what about Dr. Omar? When was the</p> <p>3 last time you remember communicating with Dr. Omar?</p> <p>4 A. I don't know; maybe before they closed. I</p> <p>5 don't remember. I spoke with them either once or</p> <p>6 twice. I don't know.</p> <p>7 Q. Oh, you think --</p> <p>8 Just to be clear about that, you think you</p> <p>9 spoke to Dr. Omar only once or twice; is that</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okie doke. Did you ever receive</p> <p>13 compensation of any type from the PLO General</p> <p>14 Delegation to the United States?</p> <p>15 A. No.</p> <p>16 Q. Did you ever hold a title of any kind with</p> <p>17 the PLO General Delegation to the United States?</p> <p>18 A. No.</p> <p>19 Q. Not even an honorary title, like Deputy</p> <p>20 Mayor of Paterson, right?</p> <p>21 A. What is Paterson has to do with the -- it</p> <p>22 doesn't have any relation.</p> <p>23 Q. I'm just asking about honorary titles?</p> <p>24 A. No.</p> <p>25 Q. I know you were the Deputy Honorary Mayor</p>	<p style="text-align: right;">Page 121</p> <p>1 A. ABU HBDA</p> <p>2 be?</p> <p>3 A. This is the Subpoena that was sent to me.</p> <p>4 Q. Okay. Do you recognize this to be the</p> <p>5 Subpoena by which the Plaintiffs in this case asked</p> <p>6 you to produce documents?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Now, I know we mentioned this</p> <p>9 before, but I want to spend just a little bit more</p> <p>10 time on it because I think we'll be able to do that</p> <p>11 a little bit more effectively now than we could</p> <p>12 before. Can you tell me what steps you took to</p> <p>13 search for documents that might be responsive to the</p> <p>14 Subpoena?</p> <p>15 A. So, I searched in my emails, and I</p> <p>16 searched in the files, if I have documents about</p> <p>17 anything, but, usually, we don't keep files.</p> <p>18 Q. Okay. And are these your personal files,</p> <p>19 sir?</p> <p>20 THE INTERPRETER: I'm sorry, this is the</p> <p>21 interpreter. The client is -- he is massaging his</p> <p>22 eyes.</p> <p>23 MR. SINAIKO: Is everybody okay? Do we</p> <p>24 need to take a short break.</p> <p>25 THE INTERPRETER: Okay.</p>

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<p style="text-align: right;">Page 122</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAIKO: Because, like I said at the</p> <p>3 beginning, we could take a break any time you need</p> <p>4 to, sir.</p> <p>5 THE INTERPRETER: No, you can continue,</p> <p>6 sir.</p> <p>7 MR. SINAIKO: Thank you very much.</p> <p>8 Q. I'm going to try to wind this up as</p> <p>9 quickly as I can. I think we're actually getting</p> <p>10 close to the end. The files that you searched for</p> <p>11 documents that might be responsive to the Subpoenas,</p> <p>12 were those your personal files?</p> <p>13 A. The files I have in my office.</p> <p>14 Q. Those are the files at the offices of Awni</p> <p>15 Abu Hbda Documentation Services in Paterson?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you have personal files at home</p> <p>18 that might possibly contain documents responsive to</p> <p>19 the Subpoena?</p> <p>20 A. No.</p> <p>21 Q. Okay. And the emails that you searched,</p> <p>22 where were those -- in what account were those</p> <p>23 emails?</p> <p>24 A. My email.</p> <p>25 Q. Your personal email, sir?</p>	<p style="text-align: right;">Page 124</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. And when did you stop providing</p> <p>3 those services?</p> <p>4 A. I don't remember. In the 90's. I don't</p> <p>5 know.</p> <p>6 Q. And, generally, what was the nature of</p> <p>7 those services?</p> <p>8 A. Paying taxes; something like that.</p> <p>9 Q. All right.</p> <p>10 MR. SINAIKO: Cosette, let's bring up --</p> <p>11 Okay. Let's go to Tab 13, please, and</p> <p>12 let's mark this as our next exhibit. Is this</p> <p>13 Exhibit 7?</p> <p>14 (Whereupon, Tab 13 was marked as Exhibit 7</p> <p>15 for identification, as of April 7th, 2021.)</p> <p>16 MS. VINCENT: It should be Exhibit 11.</p> <p>17 MR. SINAIKO: So, in a letter dated</p> <p>18 April 5, 2021, from Sara Kropf to myself, and my</p> <p>19 partner, Ron Wick.</p> <p>20 Q. I'll ask you, Mr. Abu Hbda, after you've</p> <p>21 had a chance to look at the document, have you seen</p> <p>22 it before?</p> <p>23 A. I think. Ask me to look into my records.</p> <p>24 I'm not sure whether I've seen this document or not.</p> <p>25 Q. Okay. But you see that the second</p>
<p style="text-align: right;">Page 123</p> <p>1 A. ABU HBDA</p> <p>2 A. I have only one email.</p> <p>3 Q. And that's an email account that you use</p> <p>4 for both personal and -- personal and business?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And just to be clear, and I'm just</p> <p>7 getting this off of one of the Exhibits that I</p> <p>8 mentioned, and I could show you the Exhibit if you</p> <p>9 like, but just to confirm, the email is</p> <p>10 redm@gmail.com; is that correct?</p> <p>11 A. Good.</p> <p>12 Q. And that email account, is that the only</p> <p>13 email account that's used for the business of Awni</p> <p>14 Abu Hbda Documentation Services?</p> <p>15 A. Yes, sir.</p> <p>16 Q. By the way, sir, apart from -- apart from</p> <p>17 you, personally, does any other person work for Awni</p> <p>18 Abu Hbda Documentation Services; do you have any</p> <p>19 other employees?</p> <p>20 A. I work by myself.</p> <p>21 Q. Okay. And, again, just to close off an</p> <p>22 open spot, you had mentioned before that you perform</p> <p>23 accounting services of some type; do you recall</p> <p>24 that?</p> <p>25 A. This was in the past, yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. ABU HBDA</p> <p>2 sentence of the first paragraph of the letter says,</p> <p>3 "Mr. Abu Hbda has searched his records for documents</p> <p>4 in response to your Subpoena"; do you see that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And you see that at the top of the page it</p> <p>7 says, "April 5, 2021"; do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And so I think you had mentioned</p> <p>10 before that you conducted a search of emails and</p> <p>11 files; did you do that work, prior to April 5, 2021?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did you conduct any searches</p> <p>14 for documents after April 5, 2021?</p> <p>15 A. I don't know. Maybe yesterday I saw</p> <p>16 something. I don't remember, to be honest.</p> <p>17 Q. Okay. Let's look at the third sentence of</p> <p>18 the first paragraph of this letter. In this</p> <p>19 sentence, Ms. Kropf tells my partner Mr. Wick and me</p> <p>20 that you did not have any documents responsive to</p> <p>21 the Subpoena; do you see that, sir?</p> <p>22 A. Exactly.</p> <p>23 Q. Right. And, in fact, ultimately, you did</p> <p>24 locate some documents that were responsive to the</p> <p>25 Subpoena; is that correct, sir?</p>

<p style="text-align: right;">Page 126</p> <p>1 A. ABU HBDA</p> <p>2 A. I don't know what you mean by that. I</p> <p>3 don't know.</p> <p>4 Q. There came a time, sir, did there not,</p> <p>5 where you provided some documents that were produced</p> <p>6 to the Plaintiffs, pursuant to the Subpoena in this</p> <p>7 case; isn't that right?</p> <p>8 A. One paper, maybe.</p> <p>9 Q. Okay. And do you recall how you came to</p> <p>10 locate that document?</p> <p>11 A. I continued searching in the papers I</p> <p>12 have, so I found this paper.</p> <p>13 Q. Okay. Is there any other searching that</p> <p>14 you feel you could do to locate additional documents</p> <p>15 responsive to the Plaintiff's Subpoena?</p> <p>16 A. If I find something, I will tell my</p> <p>17 attorney immediately about it, but I don't have</p> <p>18 anything else.</p> <p>19 Q. Right. And how did you -- well, let me</p> <p>20 ask you this.</p> <p>21 Before Ms. Kropf sent this letter to my</p> <p>22 partner, Mr. Wick and me, do you believe that you</p> <p>23 thoroughly searched your records for documents that</p> <p>24 might be responsive to the Subpoena?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 128</p> <p>1 A. ABU HBDA</p> <p>2 entitled, "Contract for Notary Public Services."</p> <p>3 This will be Exhibit 8.</p> <p>4 Q. Mr. Abu Hbda, do you have Exhibit 8 in</p> <p>5 front of you?</p> <p>6 A. Yes. Yes.</p> <p>7 Q. Okay. All right. And you see that --</p> <p>8 This is a document -- obviously, you've</p> <p>9 seen before because you supplied it to your attorney</p> <p>10 who, in turn, supplied it to us recently; is that</p> <p>11 correct?</p> <p>12 A. Yeah.</p> <p>13 Q. And where was this document physically</p> <p>14 located when you found it?</p> <p>15 A. One of the drawers.</p> <p>16 Q. Okay. Was that a drawer in your office in</p> <p>17 Paterson, or was that a drawer at home, or where was</p> <p>18 the drawer located?</p> <p>19 A. In Paterson.</p> <p>20 Q. Okay. And can you tell us what this</p> <p>21 document is.</p> <p>22 A. This is the contract of the Palestinian</p> <p>23 Mission. They sent it to me, but I never signed it.</p> <p>24 I never sent it back to them.</p> <p>25 Q. I see. So, this is -- you don't --</p>
<p style="text-align: right;">Page 127</p> <p>1 A. ABU HBDA</p> <p>2 Q. And how did you conclude that there might</p> <p>3 be additional documents you still needed to look</p> <p>4 for, if you did conclude that?</p> <p>5 A. To be honest, I don't know. I just</p> <p>6 looked, and I searched in the papers, and I saw</p> <p>7 these papers among the -- among the papers.</p> <p>8 Q. I see. And what did you do after you saw</p> <p>9 that piece of paper?</p> <p>10 A. I sent -- I sent it to my attorney.</p> <p>11 Q. And when did you do that, if you remember?</p> <p>12 A. Yesterday. Maybe yesterday. I don't</p> <p>13 know. I think yesterday.</p> <p>14 Q. All right.</p> <p>15 MR. SINAICO: Cosette, if we could bring</p> <p>16 up Tab 15.</p> <p>17 MS. VINCENT: Okay.</p> <p>18 MR. SINAICO: And let's mark this as our</p> <p>19 next Exhibit. Let's -- this is going to be</p> <p>20 Exhibit 8.</p> <p>21 (Whereupon, Tab 15 was marked as Exhibit 8</p> <p>22 for identification, as of April 7th, 2021.)</p> <p>23 MR. SINAICO: It's a document that has</p> <p>24 a -- the logo at the top and heading that says,</p> <p>25 "General Delegation PLO United States," and is</p>	<p style="text-align: right;">Page 129</p> <p>1 A. ABU HBDA</p> <p>2 This is a contract that you never actually</p> <p>3 entered into?</p> <p>4 A. No, no. I -- I refused it. I refused.</p> <p>5 Q. Well, maybe you could tell me --</p> <p>6 withdrawn.</p> <p>7 How did you come to receive this piece of</p> <p>8 paper?</p> <p>9 A. I don't know. Maybe it's with one of the</p> <p>10 notarized papers we sent them, they sent with them</p> <p>11 back to us. I don't remember at all. I don't</p> <p>12 remember at all how I got it.</p> <p>13 Q. Do you recall when you received this piece</p> <p>14 of paper?</p> <p>15 A. Maybe in 2014, around that time.</p> <p>16 Q. Okay. And you see there's some</p> <p>17 handwriting filled into the document in the middle</p> <p>18 of the first page?</p> <p>19 A. Yes.</p> <p>20 Q. Whose handwriting is that?</p> <p>21 A. This is my handwriting.</p> <p>22 Q. Okay. And that's your name, and your</p> <p>23 business address that -- that is written in your</p> <p>24 handwriting on the first page of Exhibit 8, correct?</p> <p>25 A. Correct.</p>



<p style="text-align: right;">Page 130</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. And this is a piece of paper that</p> <p>3 was -- strike that.</p> <p>4 Do you recall ever requesting that this</p> <p>5 document be sent to you?</p> <p>6 A. No.</p> <p>7 Q. So, as far as you know, this document was</p> <p>8 gratuitously sent to you by the General Delegation</p> <p>9 of the PLO to the United States, correct?</p> <p>10 A. Yes.</p> <p>11 Q. And I'm going to turn you to Page 3 of the</p> <p>12 document.</p> <p>13 MR. SINAIKO: Cosette, if we could just</p> <p>14 move over there. Can we zoom in on the name</p> <p>15 that's in the middle of the page? Do you see what</p> <p>16 I'm talking about there? Perfect. It's a little</p> <p>17 hard to read because the quality of the copy is</p> <p>18 not very high.</p> <p>19 Q. This is what we got from your counsel. Do</p> <p>20 you see there's a name there Maen Areikat; M-A-E-N;</p> <p>21 A-R-E-I-K-A-T?</p> <p>22 A. Yes.</p> <p>23 Q. And do you know who that is?</p> <p>24 A. He's the Ambassador of the Commission.</p> <p>25 Q. Have you ever communicated in, orally or</p>	<p style="text-align: right;">Page 132</p> <p>1 A. ABU HBDA</p> <p>2 A. All people go to see these sessions, or</p> <p>3 the meetings. It's -- I did it the same as any</p> <p>4 member of the public.</p> <p>5 Q. So, you were present just as a member of</p> <p>6 the public, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Apart from the visit to the United Nations</p> <p>9 where you saw Maen Areikat, have you ever been a</p> <p>10 member of the United Nations at that time?</p> <p>11 A. I take my children and grandchildren</p> <p>12 often, every two or three years, to show them from</p> <p>13 the outside the United Nations. So, I take them, my</p> <p>14 grandchildren, just to show them.</p> <p>15 Q. Okay.</p> <p>16 MR. SINAIKO: Looking at -- let's --</p> <p>17 let's zoom out again, please, Cosette.</p> <p>18 Q. Looking at Exhibit 8, can you point me to</p> <p>19 any trade secret that's reflected in that document?</p> <p>20 THE INTERPRETER: Sorry. Could you repeat</p> <p>21 the question again? This is the interpreter.</p> <p>22 MR. SINAIKO: Certainly.</p> <p>23 Q. Looking at Exhibit 8, Mr. Abu Hbda, can</p> <p>24 you point me to any trade secret in that document?</p> <p>25 A. What is it that you're referring to</p>
<p style="text-align: right;">Page 131</p> <p>1 A. ABU HBDA</p> <p>2 in writing, with that person?</p> <p>3 A. I saw him once, and I had a meeting, and I</p> <p>4 went, and he wasn't -- I -- it was a session, and he</p> <p>5 was there, but I've never spoken with him. I've</p> <p>6 never wrote him anything.</p> <p>7 Q. Is that a session of the UN that you</p> <p>8 personally attended?</p> <p>9 A. It's the session of the United Nations.</p> <p>10 All representative comes. It happens always.</p> <p>11 Q. So, are you talking about a General</p> <p>12 Assembly of the UN meeting, sir?</p> <p>13 A. Yeah. Yes.</p> <p>14 Q. Was that something that you watched in</p> <p>15 person or were you present?</p> <p>16 A. I went to the one follow-up visit and it</p> <p>17 was present there.</p> <p>18 Q. I see. So, did you actually interact with</p> <p>19 Maen Areikat, or was it just somebody who you saw?</p> <p>20 A. I never spoke or interacted with him.</p> <p>21 Q. Okay. So, it was just somebody who you</p> <p>22 saw at the United Nations during a visit there?</p> <p>23 A. Yes, I've only seen him; yes.</p> <p>24 Q. And why were you present at the United</p> <p>25 Nations at that time?</p>	<p style="text-align: right;">Page 133</p> <p>1 A. ABU HBDA</p> <p>2 exactly?</p> <p>3 Q. Well, let me put it a little differently.</p> <p>4 Mr. Abu Hbda, do you see any information in this</p> <p>5 document that you regard as reflecting a secret that</p> <p>6 you use in your business, secret information that</p> <p>7 you use in your business?</p> <p>8 A. I never signed this document. So, what is</p> <p>9 the content? What is inside? It doesn't belong to</p> <p>10 me. It's -- it doesn't belong to me. I didn't sign</p> <p>11 it.</p> <p>12 Q. So, would you agree then that this</p> <p>13 document does not reflect any secret or confidential</p> <p>14 information concerning your business?</p> <p>15 A. This document is not related to me. I</p> <p>16 don't have any relation whatsoever to this document.</p> <p>17 Q. Right. So, my question is, would you</p> <p>18 agree that this document does not reflect any secret</p> <p>19 or confidential information concerning your</p> <p>20 business?</p> <p>21 A. I don't understand your question, and I</p> <p>22 cannot answer this question because it's not related</p> <p>23 to me.</p> <p>24 Q. Okay. So, can we agree that this -- that</p> <p>25 this document does not reflect any information at</p>

<p style="text-align: right;">Page 134</p> <p>1 A. ABU HBDA</p> <p>2 all about the business that you run, that is Awni</p> <p>3 Abu Hbda Documentation Services?</p> <p>4 A. I don't understand your question, or what</p> <p>5 you are referring to.</p> <p>6 Q. Okay. What I'm trying to understand,</p> <p>7 Mr. Abu Hbda, is whether this document contains any</p> <p>8 information about your business, Awni Abu Hbda</p> <p>9 Documentation Services?</p> <p>10 A. Again, this is concerning -- this document</p> <p>11 is regarding documentation services, but I haven't</p> <p>12 signed it. I didn't sign it, or do anything with</p> <p>13 it.</p> <p>14 Q. When you received this document from --</p> <p>15 from the PLO General Delegation to the United</p> <p>16 States, did anybody ask you to keep the document</p> <p>17 confidential?</p> <p>18 A. No. Nobody asked me about that.</p> <p>19 Q. And does this document reflect any</p> <p>20 financial information about you or about Awni Abu</p> <p>21 Hbda Documentation Services?</p> <p>22 A. No.</p> <p>23 Q. Okay. And do you regard this document as</p> <p>24 containing information of a personal nature about</p> <p>25 anyone else or you?</p>	<p style="text-align: right;">Page 136</p> <p>1 A. ABU HBDA</p> <p>2 MS. VINCENT: Yeah, it's Exhibit 8.</p> <p>3 Q. This document that we marked, Exhibit 8,</p> <p>4 do you regard this document as containing personal</p> <p>5 or intimate information about any person?</p> <p>6 A. No.</p> <p>7 Q. And do you regard this document as</p> <p>8 containing personal or intimate information about</p> <p>9 any person?</p> <p>10 A. What do you mean by, "personal"? Are you</p> <p>11 referring to me or any person?</p> <p>12 Q. Any person. We already established that</p> <p>13 the document pertaining to you is the information</p> <p>14 you make available on your Website. What I'm asking</p> <p>15 you is, do you regard this document as containing</p> <p>16 information of a personal or intimate nature of you</p> <p>17 or any person?</p> <p>18 A. I don't know anything about this document,</p> <p>19 and I cannot answer anything regarding it.</p> <p>20 MR. SINAICO: Okay. Let's go to Tab 11,</p> <p>21 and we'll mark this as Exhibit 9.</p> <p>22 (Whereupon, Tab 11 was marked as Exhibit 9</p> <p>23 for identification, as of April 7th, 2021.)</p> <p>24 MR. SINAICO: Can we zoom in just a little</p> <p>25 bit, Cosette? Just to make it a little more</p>
<p style="text-align: right;">Page 135</p> <p>1 A. ABU HBDA</p> <p>2 A. It has my name and my address; that's all.</p> <p>3 Q. Right. And do you regard that</p> <p>4 information -- well, withdrawn.</p> <p>5 Do you regard that name and business</p> <p>6 address as personal or intimate information about</p> <p>7 you?</p> <p>8 A. It's a business information.</p> <p>9 Q. Okay. But publicly available business</p> <p>10 information, correct?</p> <p>11 A. Maybe.</p> <p>12 Q. Well, it's on your Website; isn't it, sir?</p> <p>13 A. Yes, that's possible.</p> <p>14 Q. With your name and telephone --</p> <p>15 It's possible. Should we go back and look</p> <p>16 at the Website again? Would you like me to look at</p> <p>17 the Website again, sir?</p> <p>18 A. I told you. This is a business</p> <p>19 information that is available on the Website.</p> <p>20 Q. Okay. Perfect. And this document -- I'm</p> <p>21 going to just come back to one or two other things.</p> <p>22 This document that we've marked as, I think it's</p> <p>23 Exhibit 8.</p> <p>24 MR. SINAICO: Is it 8? Are we on Exhibit</p> <p>25 8, Cosette? I think it is Exhibit 8.</p>	<p style="text-align: right;">Page 137</p> <p>1 A. ABU HBDA</p> <p>2 legible. So, this is a document that we obtained</p> <p>3 from the Internet, from the Website of the</p> <p>4 permanent observer Palestine to the United Nations</p> <p>5 of New York. It's an excerpt from the Website,</p> <p>6 and I would ask the court reporter to mark it as</p> <p>7 Deposition Exhibit 9.</p> <p>8 Q. Okay. I just have a few questions about</p> <p>9 this one. Mr. Abu Hbda, do you see that there's a</p> <p>10 list of names in the middle of the page here? Let's</p> <p>11 zoom in a little bit. It's testing everybody's eyes</p> <p>12 here. It's hard to see. Can you see that better?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Can you see that the first name is</p> <p>15 Riyadh Mansour?</p> <p>16 A. Yes.</p> <p>17 Q. And do you know that person?</p> <p>18 A. You know.</p> <p>19 Q. How do you know that person?</p> <p>20 A. I see him in the UN. He comes sometimes</p> <p>21 for meetings. He participates with people's</p> <p>22 concerns. If someone dies, if there is a, like some</p> <p>23 incidents, or if there's a celebration, he comes to</p> <p>24 celebrate with us involved in the community.</p> <p>25 Q. How many times would you say you've met</p>

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<p>1 A. ABU HBDA</p> <p>2 Mr. Mansour?</p> <p>3 A. I've never had a special meeting with him</p> <p>4 in my life. I never sat with him. I see him. I</p> <p>5 shake hands with him, like other people do.</p> <p>6 Q. Okay. Apart from seeing him, and shaking</p> <p>7 hands with him, have you ever had a substantive</p> <p>8 communication with him, beyond pleasantries?</p> <p>9 A. Maybe we speak when there is a</p> <p>10 celebration, there is a funeral, there is a wedding,</p> <p>11 there is a dinner. So, just in general speaking, we</p> <p>12 don't discuss politics; that's general speaking.</p> <p>13 He's a public figure. Everybody knows him.</p> <p>14 Q. Okay. But your interactions with him,</p> <p>15 Mr. Abu Hbda -- let me withdraw that.</p> <p>16 Mr. Abu Hbda, do you have interactions, or</p> <p>17 have you ever had interactions with Mr. Mansour,</p> <p>18 other than, you know, of a social nature?</p> <p>19 A. No.</p> <p>20 Q. Okay. Let's go to the next person Feda</p> <p>21 Abdelhady-Nasser; do you see that person's name?</p> <p>22 A. I don't know.</p> <p>23 Q. My question -- let me just get a clear</p> <p>24 question and answer. Do you know Feda</p> <p>25 Abdelhady-Nasser personally?</p>	<p>1 A. ABU HBDA</p> <p>2 Abushawesh; do you see that name, sir?</p> <p>3 A. Yes.</p> <p>4 Q. And have you ever met Abdallah Abushawesh?</p> <p>5 A. Yes.</p> <p>6 Q. You have, right? And who do you</p> <p>7 understand Abdallah Abushawesh to be?</p> <p>8 A. I don't know. He works in the UN, in the</p> <p>9 Mission. I don't know.</p> <p>10 Q. Would you say that you know Abdallah</p> <p>11 Abushawesh personally?</p> <p>12 A. No.</p> <p>13 Q. Have you ever communicated with Abdallah</p> <p>14 Abushawesh?</p> <p>15 A. I think I saw him once only in the UN, and</p> <p>16 I spoke with him once; that's it.</p> <p>17 Q. And what was the nature of the</p> <p>18 conversation, if you remember?</p> <p>19 A. "How are you? How is your family? How is</p> <p>20 your children?"</p> <p>21 Q. And were those questions that he was</p> <p>22 asking of you, or were those questions you were</p> <p>23 asking of him?</p> <p>24 A. We both asked the same questions.</p> <p>25 Q. I see. And where did this meeting happen?</p>
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<p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. Have you ever met Feda Abdelhady-Nasser?</p> <p>4 A. No.</p> <p>5 Q. To your knowledge, have you ever</p> <p>6 communicated with Feda Abdelhady-Nasser?</p> <p>7 A. No.</p> <p>8 Q. Okay. The next person down on the list</p> <p>9 Nadya Rasheed; have you ever seen that, Mr. Abu</p> <p>10 Hbda?</p> <p>11 A. Yes, I see her.</p> <p>12 Q. And have you ever met Nadya Rasheed?</p> <p>13 A. No.</p> <p>14 Q. And have you ever communicated with Nadya</p> <p>15 Rasheed?</p> <p>16 A. No.</p> <p>17 Q. Okay. Let's go to the next name on the</p> <p>18 list Majed Bamy; do you see that name?</p> <p>19 A. Yes.</p> <p>20 Q. And have you ever Majed Bamy?</p> <p>21 A. No.</p> <p>22 Q. And to your knowledge, have you ever</p> <p>23 communicated with Majed Bamy?</p> <p>24 A. No.</p> <p>25 Q. Let's go to the next name, Abdallah</p>	<p>1 A. ABU HBDA</p> <p>2 A. In the -- it's in the UN.</p> <p>3 Q. And what was the context for you meeting</p> <p>4 Abdallah Abushawesh at the UN?</p> <p>5 THE INTERPRETER: I'm sorry. Interpreter.</p> <p>6 Could you repeat the question?</p> <p>7 MR. SINAIKO: Sure.</p> <p>8 Q. What was the context for you meeting</p> <p>9 Abdallah Abushawesh at the UN?</p> <p>10 A. There was no specific. He was there, and</p> <p>11 there was some people there, and I saw him.</p> <p>12 Q. Okay. And apart from this one</p> <p>13 communication that you recall, can you recall any</p> <p>14 other communications with Mr. Abdallah Abushawesh?</p> <p>15 A. No.</p> <p>16 Q. Okay. Let's go to the next name, Nada</p> <p>17 Tarbush; do you see that name there, sir?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Have you ever met Ms. Nada Tarbush?</p> <p>20 A. No.</p> <p>21 Q. Have you ever communicated with Nada</p> <p>22 Tarbush?</p> <p>23 A. No.</p> <p>24 Q. Okay. And let's go to the next name on</p> <p>25 the list. Can you see Ms. Sahar Abushawesh?</p>

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<p>1 A. ABU HBDA</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And have you ever met Ms. Sahar</p> <p>4 Abushawesh?</p> <p>5 A. No.</p> <p>6 Q. Have you ever communicated with Sahar</p> <p>7 Abushawesh?</p> <p>8 A. No.</p> <p>9 Q. Okay. Let's go down to the next one;</p> <p>10 Ms. Sahar Salam; do you see that name Sahar Salam?</p> <p>11 A. Yes, I saw the name, yes.</p> <p>12 Q. Okay. Have you ever met Sahar Salam?</p> <p>13 A. No.</p> <p>14 Q. Okay. And have you ever communicated with</p> <p>15 Ms. Sahar Salam?</p> <p>16 A. No.</p> <p>17 Q. Okay. And the last name on the list</p> <p>18 Ms. Nadia Ghannam; do you see that name?</p> <p>19 A. I see it, yes.</p> <p>20 Q. Okay. And have you ever met Ms. Nadia</p> <p>21 Ghannam?</p> <p>22 A. Her name is not strange to me, but I've</p> <p>23 never met her in person.</p> <p>24 Q. Right. And have you ever communicated</p> <p>25 with Nadia Ghannam?</p>	<p>1 A. ABU HBDA</p> <p>2 THE VIDEOGRAPHER: We are now back on the</p> <p>3 record. The time is 20:30 UTC Time.</p> <p>4 Q. Okay. Mr. Abu Hbda, I just have a few</p> <p>5 more questions for you today. Do you recall, sir,</p> <p>6 that we were looking at a list of notaries public</p> <p>7 that was maintained by the PLO General Delegation to</p> <p>8 the United States, a list that you were on?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And are you aware of any other</p> <p>11 lists of that nature, that is lists of notary</p> <p>12 publics in the United States that are -- that is</p> <p>13 currently maintained by the Palestinian Authority?</p> <p>14 A. I don't have any lists.</p> <p>15 Q. No, but were you aware of the existence of</p> <p>16 any such list?</p> <p>17 A. You can ask the Mission in Canada, the</p> <p>18 Embassy for me. I don't know.</p> <p>19 Q. Ah. So, just to come back to the</p> <p>20 question. Were you aware of the --</p> <p>21 Were you aware that that Palestinian</p> <p>22 Authority maintains any list of notaries in the</p> <p>23 United States, similar to the one we looked at from</p> <p>24 the former PLO General Delegation to the United</p> <p>25 States?</p>
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<p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 MR. SINAICO: Let's move back up to to top</p> <p>4 of this page. Page -- Exhibit 9.</p> <p>5 Q. Have you -- I guess I'll try to limit the</p> <p>6 question to at any time during 2020 or 2021, and we</p> <p>7 could put aside the conversations with Mr. Mansour</p> <p>8 that you've already told us about, and the other</p> <p>9 conversations that you've already told us about, you</p> <p>10 know, in the last couple of minutes.</p> <p>11 Putting aside those conversations, do you</p> <p>12 recall, at any time in 2020 or 2021, having any</p> <p>13 communication with anybody that you understood to be</p> <p>14 an employee of, or an agent of, or affiliated with</p> <p>15 the permanent member of the State of Palestinian</p> <p>16 Mission in New York?</p> <p>17 A. No.</p> <p>18 MR. SINAICO: Alrighty. If we could -- I</p> <p>19 think I'm actually close to finished. If we could</p> <p>20 go off the record. I probably want 15 minutes to</p> <p>21 gather my notes, and I think we're very close to</p> <p>22 done. Would it be all right if we took a break?</p> <p>23 MS. KROPF: If we could do a little</p> <p>24 shorter than 15 minutes.</p> <p>25 (Whereupon, a short recess was taken.)</p>	<p>1 A. ABU HBDA</p> <p>2 A. You have to ask them themselves about</p> <p>3 this. For me, I don't know.</p> <p>4 Q. You don't know? I'm just trying to</p> <p>5 know --</p> <p>6 I'm just trying to confirm if you're aware</p> <p>7 of such a thing or not.</p> <p>8 A. I don't know. Maybe there is. I don't</p> <p>9 know about this.</p> <p>10 Q. So, you're unaware of any such list, just</p> <p>11 to be clear?</p> <p>12 A. I don't have a list or know, but maybe</p> <p>13 there is a list with names on it. I don't know.</p> <p>14 Q. Okay. And do you know whether any such</p> <p>15 list is maintained by the Palestinian Liberation</p> <p>16 Organization?</p> <p>17 A. Why don't you go and ask the PLO? Why --</p> <p>18 how would I know about that?</p> <p>19 Q. I'm just asking you, sir, if you could let</p> <p>20 us know if you're aware of any such ID, I'd be</p> <p>21 grateful.</p> <p>22 A. I don't know. I don't have a list. I</p> <p>23 know there's people who sign, but I don't have a</p> <p>24 list. I don't know.</p> <p>25 Q. Okay. And the office that you mentioned</p>

<p style="text-align: right;">Page 146</p> <p>1 A. ABU HBDA</p> <p>2 in Canada to which you send documents when you would</p> <p>3 like them legalized or certified by the Palestinian</p> <p>4 Authority, do you know where that office in Canada</p> <p>5 maintains such a list, just to your knowledge? I'm</p> <p>6 not asking whether they do or not. I'm asking if</p> <p>7 you know whether they do or not.</p> <p>8 MR. BERGER: I'm going to object to the</p> <p>9 form as misstating his prior testimony.</p> <p>10 But, you could answer.</p> <p>11 Q. Let me put the question again in a way</p> <p>12 that will hopefully not draw an objection. The</p> <p>13 office in Canada that we've been speaking about</p> <p>14 today; you know what I'm talking about, correct,</p> <p>15 sir?</p> <p>16 A. I know, but I don't know what the Mission,</p> <p>17 or the office in Canada knows, or keeps, or what</p> <p>18 they don't know. You could call them and ask them</p> <p>19 about that.</p> <p>20 Q. You're getting ahead of me a little bit.</p> <p>21 I'm first trying to make a clear record here. The</p> <p>22 office in Canada, remember we looked at the document</p> <p>23 that had the red stamp and the blue stamp on it?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And you remember that was the</p>	<p style="text-align: right;">Page 148</p> <p>1 A. ABU HBDA</p> <p>2 your business Awni Abu Hbda Documentation Services?</p> <p>3 A. No. The Authority or the government, they</p> <p>4 don't send anything to us. They haven't sent</p> <p>5 anything to us.</p> <p>6 Q. Okay. Were you aware whether at any time</p> <p>7 January 4, 2020, the Palestinian Liberation</p> <p>8 Organization has referred any customers or clients</p> <p>9 to your business Awni Abu Hbda Documentation</p> <p>10 Services?</p> <p>11 A. No, they haven't sent anything.</p> <p>12 Q. Okay. Are you aware whether this office</p> <p>13 in Canada that we've been talking about, the one</p> <p>14 which you sent the document with the red and blue</p> <p>15 stamp on it, were you aware whether that office,</p> <p>16 since January 2020, has referred any customers or</p> <p>17 clients to your business Awni Abu Hbda Documentation</p> <p>18 Services?</p> <p>19 Just looking at the realtime record, I</p> <p>20 want to be sure that my record reflects my question</p> <p>21 pertains to any referrals of customers or clients on</p> <p>22 or after January 4, 2020.</p> <p>23 A. No.</p> <p>24 Q. Okay. And are you aware whether the</p> <p>25 Permanent Observer Mission to the United Nations</p>
<p style="text-align: right;">Page 147</p> <p>1 A. ABU HBDA</p> <p>2 document that you sent to an office in Canada,</p> <p>3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And that office in Canada, were you</p> <p>6 aware of whether that office in Canada maintains a</p> <p>7 list of notary publics in the United States who can</p> <p>8 perform notarial services, and a list that we looked</p> <p>9 at before to the PLO General Delegation to the</p> <p>10 United States?</p> <p>11 A. I don't know. I know they had my name,</p> <p>12 but for other names, I don't know.</p> <p>13 Q. You know they have your name?</p> <p>14 A. They signed my paper, so they know my</p> <p>15 name.</p> <p>16 Q. Got it. Okay. And one further question,</p> <p>17 are you aware whether the permanent observer to the</p> <p>18 United Nations maintains a list of notaries public,</p> <p>19 in the United States similar to the one maintained</p> <p>20 by the General Delegations PLO to the United States?</p> <p>21 A. I don't know anything about the Mission of</p> <p>22 the UN; I don't know anything about it.</p> <p>23 Q. Okay. Were you aware that any time after</p> <p>24 January 4, 2020, that's January 4 of last year, the</p> <p>25 Palestinian Authority has referred any customer to</p>	<p style="text-align: right;">Page 149</p> <p>1 A. ABU HBDA</p> <p>2 Mission in New York has referred any customers or</p> <p>3 clients to Awni Abu Hbda Documentation Services on</p> <p>4 or after January 4, 2020?</p> <p>5 A. No, they didn't.</p> <p>6 Q. And on or after January 4, 2020, have you</p> <p>7 been paid any money or given anything of value by</p> <p>8 the Palestinian Liberation Organization?</p> <p>9 A. No.</p> <p>10 Q. And on or after January 4, 2020, have you</p> <p>11 been paid any money, or given anything of value by</p> <p>12 the Palestinian Liberation Organization?</p> <p>13 A. No.</p> <p>14 Q. And on or after January 4th, 2020, have</p> <p>15 you been given any -- have you been paid any money</p> <p>16 or given anything of value by the, you know, by the</p> <p>17 office in Canada that we referred to before, the one</p> <p>18 to which you sent the document with the red and the</p> <p>19 blue stamp?</p> <p>20 A. No.</p> <p>21 Q. And on or after January 4, 2020, have you</p> <p>22 been paid any money, or given anything of value by</p> <p>23 the Permanent Observer Mission to the United Nations</p> <p>24 in New York City, the one we've been talking about?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 150</p> <p>1 A. ABU HBDA</p> <p>2 Q. On or after January 4, 2020, have you</p> <p>3 entered into any agreements with the Palestinian</p> <p>4 Authority?</p> <p>5 A. No.</p> <p>6 Q. On or after January 4, 2020, have you</p> <p>7 entered into any agreements with the Palestinian</p> <p>8 Liberation Organization?</p> <p>9 A. No.</p> <p>10 Q. And on or after January 4, 2020, have you</p> <p>11 entered into any agreements with the office in</p> <p>12 Canada that we've been talking about to which you</p> <p>13 sent the document, the red and the blue stamp?</p> <p>14 A. No.</p> <p>15 Q. And on or after January 4, 2020, have you</p> <p>16 entered into any agreements with the Permanent</p> <p>17 Observer Mission to the United Nations Mission in</p> <p>18 New York?</p> <p>19 A. No.</p> <p>20 Q. By the way, just to clarify, you</p> <p>21 understand that my questions about the Permanent</p> <p>22 Observer Mission, you know, the Permanent Observer</p> <p>23 Mission to the United Nations in New York, that's a</p> <p>24 reference to the -- hang on one second, the -- the</p> <p>25 entity whose Website, you know, we looked at as</p>	<p style="text-align: right;">Page 152</p> <p>1 A. ABU HBDA</p> <p>2 A. On TV.</p> <p>3 Q. And do you know from where Mr. Mansour</p> <p>4 delivered the speech that you delivered on TV?</p> <p>5 Sorry, let me withdraw that.</p> <p>6 Do you know where Mr. Mansour delivered</p> <p>7 the speeches that you saw him deliver on television?</p> <p>8 A. How would I know, but most of them are in</p> <p>9 the UN.</p> <p>10 Q. Do you know the locations of any are --</p> <p>11 that are not in the UN?</p> <p>12 A. No, I don't know.</p> <p>13 Q. Have you ever seen Mr. -- apart from</p> <p>14 social gatherings, have you ever seen Mr. Mansour in</p> <p>15 person, other than at the United Nations</p> <p>16 headquarters?</p> <p>17 A. No.</p> <p>18 Q. Okay. And turning back to just</p> <p>19 momentarily -- and we could put the list up if we</p> <p>20 need to -- turning back to the list of personnel</p> <p>21 from Exhibit 9, the list of personnel from the</p> <p>22 Permanent Observer Mission in New York, have you</p> <p>23 ever seen -- and apart from the social occasions</p> <p>24 that you mentioned with respect to Mr. Mansour, have</p> <p>25 you ever seen any of those individuals, other than</p>
<p style="text-align: right;">Page 151</p> <p>1 A. ABU HBDA</p> <p>2 Exhibit 9; you understand that, correct?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And apart from seeing Mr. Mansour at the</p> <p>5 United Nations, or seeing Mr. Mansour at social --</p> <p>6 on social occasions of the sort that you described,</p> <p>7 that is to say family events, I suppose it was</p> <p>8 funerals you mentioned -- let me withdraw that.</p> <p>9 You mentioned before that you've seen</p> <p>10 Mr. Mansour at certain types of events outside of</p> <p>11 the United Nations; do you remember that?</p> <p>12 A. Maybe; yes.</p> <p>13 Q. Can you just give us a description of the</p> <p>14 sort of events those were? I know we're going back</p> <p>15 a little bit, but I just want to try to refresh your</p> <p>16 recollection.</p> <p>17 A. It's from gathering, maybe a wedding, a</p> <p>18 funeral; it's something -- it's not related, and</p> <p>19 even if it's in New York, it's not in the same area.</p> <p>20 Q. Okay. Apart from these social gatherings,</p> <p>21 are you aware of any other activities that</p> <p>22 Mr. Mansour engages in here in the United States?</p> <p>23 A. How would I know?</p> <p>24 Q. Well, have you ever attended, for example,</p> <p>25 a speech that Mr. Mansour delivered?</p>	<p style="text-align: right;">Page 153</p> <p>1 A. ABU HBDA</p> <p>2 the individuals from the UN headquarters in New</p> <p>3 York?</p> <p>4 A. No. No.</p> <p>5 Q. Okay. Let me go on mute for 30 seconds.</p> <p>6 I think I'm done. I just want to confirm. Hang on</p> <p>7 one sec.</p> <p>8 MR. SINAIKO: Okay. Mr. Abu Hbda, I have</p> <p>9 no further questions for you at this time, and I'm</p> <p>10 prepared to hand the Witness over to Mr. Berger,</p> <p>11 if he'd like to examine.</p> <p>12 MR. BERGER: Yes. Thank you. And thank</p> <p>13 you for your patience.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>



<p style="text-align: right;">Page 154</p> <p>1 A. ABU HBDA</p> <p>2 EXAMINATION BY</p> <p>3 MR. BERGER:</p> <p>4 Q. Mr. Abu Hbda, I won't take very much of</p> <p>5 your time. My name is Mitchell Berger. I'm one of</p> <p>6 the lawyers for the Palestinian Liberation</p> <p>7 Organization, and for the record, have we ever met</p> <p>8 before.</p> <p>9 A. No.</p> <p>10 Q. Thank you. I want to take you back to a</p> <p>11 question that Mr. Sinaiko asked you, and an answers</p> <p>12 you gave earlier this afternoon. It was at Page 74,</p> <p>13 starting at Line 1 of the --</p> <p>14 MR. SINAIKO: Would you mind if I just --</p> <p>15 back there? I just need a moment.</p> <p>16 MR. BERGER: Go ahead. Let me know when</p> <p>17 you're -- you're at Page 74 line --</p> <p>18 MR. SINAIKO: Go ahead. Okie Doke. I'm</p> <p>19 there.</p> <p>20 Q. Okay. So, Mr. Abu Hbda, you were asked</p> <p>21 this question and you gave this answer. Question,</p> <p>22 "Sir, have you ever had personal authority to</p> <p>23 provide certification of a document on behalf of the</p> <p>24 Palestinian Authority?"</p> <p>25 And you gave the answer, "no."</p>	<p style="text-align: right;">Page 156</p> <p>1 A. ABU HBDA</p> <p>2 MS. KROFF: Yeah.</p> <p>3 MR. SINAIKO: So, while we're on the</p> <p>4 record, in light of Mr. Abu Hbda's testimony</p> <p>5 today, can we withdraw the Confidential</p> <p>6 designation on the document that was produced to</p> <p>7 us? Can you withdraw that designation?</p> <p>8 MS. KROFF: You know, let me just double</p> <p>9 check my client candidly -- I put that on because</p> <p>10 my client -- let me talk to him about that and get</p> <p>11 back to you.</p> <p>12 MR. SINAIKO: It seems pretty clear from</p> <p>13 the testimony that there's no basis for the</p> <p>14 confidential designation or run around getting</p> <p>15 confidential designations withdrawn. I figured I</p> <p>16 would just ask.</p> <p>17 MS. KROFF: Can you send me whatever</p> <p>18 Protective Order's in place, so I could look at</p> <p>19 the language?</p> <p>20 MR. SINAIKO: Erica, could you take a look</p> <p>21 at that?</p> <p>22 MS. LAI: We could go off the record.</p> <p>23 (Continued on next page to accommodate</p> <p>24 jurat.)</p> <p>25</p>
<p style="text-align: right;">Page 155</p> <p>1 A. ABU HBDA</p> <p>2 Do you recall being asked that question</p> <p>3 and being given that answer?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I would like to use Mr. Sinaiko's</p> <p>6 phrasing of, "on behalf of," and ask you two</p> <p>7 questions, if I may. Is that all right with you?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Since January 4, 2020, have you</p> <p>10 provided any services on behalf of the Palestinian</p> <p>11 Authority?</p> <p>12 MR. SINAIKO: Objection.</p> <p>13 A. No.</p> <p>14 Q. Since January 4, 2020, have you provided</p> <p>15 any services on behalf of the Palestinian Liberation</p> <p>16 Organization?</p> <p>17 MR. SINAIKO: Objection.</p> <p>18 A. No.</p> <p>19 MR. BERGER: That's all I have. Thank</p> <p>20 you.</p> <p>21 MR. SINAIKO: Mr. Abu Hbda, we really</p> <p>22 appreciate your time today and your patience.</p> <p>23 THE VIDEOGRAPHER: We are now --</p> <p>24 MR. SINAIKO: Before we go off the record,</p> <p>25 I had one question to ask of Sara.</p>	<p style="text-align: right;">Page 157</p> <p>1</p> <p>2 THE VIDEOGRAPHER: Okay. If everyone's</p> <p>3 ready. We are now off the record. The time is</p> <p>4 20:54 UTC Time, and this concludes today's</p> <p>5 testimony given by Awni Abu Hbda Documentation</p> <p>6 Services. Thank you, everyone. Thank you,</p> <p>7 Mr. Abu Hbda.</p> <p>8 -oOo-</p> <p>9 (Whereupon, the examination of Awni Abu Hbda</p> <p>10 was concluded at 4:54 p.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 Awni Abu Hbda</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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April 07, 2021

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<p>Page 158</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I, AMBRIA IANAZZI, do hereby Certify:</p> <p>5 THAT Awni Abu HBDA was sworn under penalty of</p> <p>6 perjury by a Notary Public.</p> <p>7</p> <p>8 THAT the deposition transcript herein is a</p> <p>9 verbatim record of the testimony given by Awni Abu</p> <p>10 HBDA, stenographically record by a Registered</p> <p>11 Professional Reporter, and Certified Realtime</p> <p>12 Reporter.</p> <p>13</p> <p>14 THAT I am not related to any of the Parties</p> <p>15 to this Action by blood or marriage; and I have no</p> <p>16 interest, financial or otherwise, in the outcome of</p> <p>17 the case.</p> <p>18</p> <p>19</p> <p>20 CERTIFICATION DATE: April 12th, 2021.</p> <p>21</p> <p>22</p> <p>23</p> <p>24 <u><i>Ambria Ianazzi</i></u></p> <p>25 AMBRIA IANAZZI, RPR, CRR, RCR, CSR</p>	<p>Page 159</p> <p>1 Errata Sheet</p> <p>2</p> <p>3 NAME OF CASE: SHABTAI SCOTT SHATSKY -against- PALESTINE LIBERATION ORGANIZATION</p> <p>4 DATE OF DEPOSITION: 04/07/2021</p> <p>5 NAME OF WITNESS: Awni Abu Hba</p> <p>6 Reason Codes:</p> <p>7 1. To clarify the record.</p> <p>8 2. To conform to the facts.</p> <p>9 3. To correct transcription errors.</p> <p>10 Page ____ Line ____ Reason ____</p> <p>11 From ____ to ____</p> <p>12 Page ____ Line ____ Reason ____</p> <p>13 From ____ to ____</p> <p>14 Page ____ Line ____ Reason ____</p> <p>15 From ____ to ____</p> <p>16 Page ____ Line ____ Reason ____</p> <p>17 From ____ to ____</p> <p>18 Page ____ Line ____ Reason ____</p> <p>19 From ____ to ____</p> <p>20 Page ____ Line ____ Reason ____</p> <p>21 From ____ to ____</p> <p>22 Page ____ Line ____ Reason ____</p> <p>23 From ____ to ____</p> <p>24</p> <p>25</p>
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